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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,)	2:15-cr-220-JCM-VCF
)	
Plaintiff,)	
)	
v.)	
)	
LEON JOHNSON,)	
)	
Defendant.)	
_____)	

STIPULATION FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney, counsel for the United States of America, and Paul Riddle, Assistant Federal Public Defender, counsel for Defendant LEON JOHNSON, that the date for the Government to file a response to the Defendant's Motion to Dismiss the Indictment and to Dismiss Counts Two and Four of the Indictment (Docket #26) be extended for seven (7) days.

This stipulation is entered for the following reasons:

1. The Defendant's Motion was filed and served on October 5, 2015. The Government's response deadline is October 19, 2015.

2. Counsel for the undersigned has been dealing with an uptick in the press of business, necessitating more time for the Government to prepare a response to the Defendant's

1 Motion. Undersigned counsel for the Government respectfully requests more time to research
2 the issues raised in the Defendant's Motion.

3 3. The Defendant is incarcerated, but he does not object to the continuance of the
4 Government's response deadline.

5 4. The additional time requested herein is not sought for purposes of delay, but
6 merely to allow the Government to have adequate time to prepare an appropriate response to the
7 Defendant's Motion.

8 5. Additionally, denial of this request for continuance could result in a miscarriage
9 of justice.

10 6. This is the first stipulation filed herein to continue the Government's response
11 deadline.

12 DATED: October 19, 2015.

13
14 /s/
15 PHILLIP N. SMITH, JR.
16 Assistant United States Attorney
17 Counsel for the United States

13
14 /s/
15 PAUL RIDDLE
16 Assistant Federal Public Defender
17 Counsel for Defendant LEON JOHNSON

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

* * *

UNITED STATES OF AMERICA,) **2:15-cr-220-JCM-VCF**
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LEON JOHNSON,)
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Defendant.)
_____)

FINDINGS OF FACT

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court finds that:

1. The Defendant's Motion was filed and served on October 5, 2015. The Government's response deadline is October 19, 2015.

2. Counsel for the undersigned has been dealing with an uptick in the press of business, necessitating more time for the Government to prepare a response to the Defendant's Motion. Undersigned counsel for the Government respectfully requests more time to research the issues raised in the Defendant's Motion.

3. The Defendant is incarcerated, but he does not object to the continuance of the Government's response deadline.

4. The additional time requested herein is not sought for purposes of delay, but merely to allow the Government to have adequate time to prepare an appropriate response to the Defendant's Motion.

5. Additionally, denial of this request for continuance could result in a miscarriage of justice.

